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*Attorneys for Plaintiff, HSBC Bank USA, N.A., As Trustee For The Registered Holders Of Nomura Home Equity Loan, Inc., Asset-Backed Certificates, Series 2006-HE2*

10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 HSBC BANK USA, N.A., AS TRUSTEE  
13 FOR THE REGISTERED HOLDERS OF  
14 NOMURA HOME EQUITY LOAN, INC.,  
15 ASSET-BACKED CERTIFICATES, SERIES  
16 2006-HE2,

17 Plaintiff,

18 vs.

19 FIDELITY NATIONAL TITLE INSURANCE  
20 COMPANY,

21 Defendant.

Case No.: 3:19-CV-00265-MMD-CSD

**STIPULATION AND ORDER TO  
EXTEND TIME PERIOD TO RESPOND  
TO MOTION TO DISMISS [ECF No. 50]**

**[Second Request]**

22 Plaintiff, HSBC Bank USA, N.A., As Trustee For The Registered Holders Of Nomura Home Equity Loan, Inc., Asset-Backed Certificates, Series 2006-HE2 (“HSBC”) and Defendant Fidelity National Title Insurance Company (“Fidelity”), by and through their counsel of record, hereby stipulate and agree as follows:

- 23 1. On January 18, 2022, HSBC filed its First Amended Complaint [ECF No. 47];
- 24 2. On January 28, 2022, Fidelity filed a Motion to Dismiss [ECF No. 50];
- 25 3. HSBC’s deadline to respond to Fidelity’s Motion to Dismiss is currently February 18,
- 26 2022 [ECF No. 52];
- 27 4. HSBC’s counsel is requesting a brief extension until February 22, 2022, to file its
- 28 response to the pending Motion due to unforeseen technical difficulties;

- 1 5. Counsel for Fidelity does not oppose the requested extension;  
2 6. This is the second request for an extension which is made in good faith and not for  
3 purposes of delay.  
4 7. Additionally, the parties agree that Fidelity will not need to file an answer to the First  
5 Amended Complaint [ECF No. 47] until fourteen (14) days after the Court enters an  
6 Order ruling on the Motion to Dismiss, if an answer is necessary;

7 **IT IS SO STIPULATED.**

8 DATED this 18<sup>th</sup> day of February, 2022.

DATED this 18<sup>th</sup> day of February, 2022.

9 WRIGHT, FINLAY & ZAK, LLP  
10

EARLY SULLIVAN WRIGHT GIZER &  
McRAE LLP

11 /s/ Lindsay D. Dragon

/s/ Sophia S. Lau

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15 *Attorneys for Plaintiff, HSBC Bank USA,*  
16 *N.A., As Trustee For The Registered Holders*  
*Of Nomura Home Equity Loan, Inc., Asset-*  
*Backed Certificates, Series 2006-HE2*

*Attorney for Defendant, Fidelity National*  
*Title Insurance Company*

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19 **IT IS SO ORDERED.**

20  
21 Dated this 18th day of February, 2022.



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23 UNITED STATES DISTRICT JUDGE  
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